

**Iowa Department of Natural Resources
Title V Operating Permit**

Name of Permitted Facility: DuPont Performance Coatings

Facility Location: 801 35th Street

Fort Madison, Iowa

Air Quality Operating Permit Number: 03-TV-035

Expiration Date: November 24, 2008

EIQ Number: 92-1502

Facility File Number: 56-02-005

Responsible Official

Name: Ajit Venkatraman

Title: Plant Manager

Mailing Address: P.O. Box 319

Fort Madison, IA 52627

Phone #: 319/376-5220

Permit Contact Person for the Facility

Name: Holly K. Ritter

Title: Site Environmental Engineer

Mailing Address: P.O. Box 319

Fort Madison, IA 52627

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This permit is issued in accordance with 567 Iowa Administrative Code Chapter 22, and is issued subject to the terms and conditions contained in this permit.

For the Director of the Department of Natural Resources

Douglas A. Campbell, Supervisor of Air Operating Permits Section

Date

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Abbreviations

acfm.....	actual cubic feet per minute
BHP.....	Brake Horsepower
CFR.....	Code of Federal Regulation
°F.....	degrees Fahrenheit
EIQ.....	emissions inventory questionnaire
EP.....	emission point
EU.....	emission unit
gr./dscf.....	grains per dry standard cubic foot
gr./100 cf.....	grains per one hundred cubic feet
IAC.....	Iowa Administrative Code
IDNR.....	Iowa Department of Natural Resources
MVAC.....	motor vehicle air conditioner
N/A.....	not applicable
NSPS.....	new source performance standard
ppmv.....	parts per million by volume
lb./hr.....	pounds per hour
lb./MMBtu.....	pounds per million British thermal units
scfm.....	standard cubic feet per minute
SIC.....	Standard Industrial Classification Code
TPY.....	Tons per year
USEPA.....	United States Environmental Protection Agency

Pollutants

PM.....	particulate matter
PM ₁₀	particulate matter ten microns or less in diameter
SO ₂	sulfur dioxide
NO _x	nitrogen oxides
VOC.....	volatile organic compound
CO.....	carbon monoxide
HAP.....	hazardous air pollutant
HPA.....	hydroxypropyl acrylate

I. Facility Description and Equipment List

Facility Name: DuPont Performance Coatings

Permit Number: 03-TV-035

Facility Description: Printing Ink and Paints and Resin Manufacture (SIC 2893)

Equipment List

Emission Point Number(s)	Associated Emission Unit Number(s)	Associated Emission Unit Description
Paint Manufacturing		
811	EU-1A	Filling Floor – Paint Manufacturing
815-820		
825		
811-812	EU-1B	Finish Product Let Down Tanks
815-820		
824		
825		
801-805	EU-1C	Dispersion Loading/Grinding/Mixing
807-808		
811-813		
818-820		
824-825		
Solvent Recovery System		
156	002-CRS	Clean Solvent Tank
	002-DRS-1	Dirty Solvent Tank 1
	002-DRS-2	Dirty Solvent Tank 2
	002-PT	Paint Tank
	002-ST	Sludge Tank
	002-TFE	Storage Tank
Thinner Blend Tanks		
450	EU-03(3702)	Thinner Blend Tanks
451	EU-03(3703)	
452	EU-03(15107)	
453	EU-03(10104)	
454	EU-03(15106)	
455	EU-03(15108)	
456	EU-03(3701)	
457	EU-03(15105)	

Emission Point Number(s)	Associated Emission Unit Number(s)	Associated Emission Unit Description
845-847	004	Thinner Drum & Tote Filling
Dispersion Loading Premix Tanks		
429B	EU-06A	Dispersion Load Premix Tanks 47203 & 47204
407	EU-06B	Dispersion Load Premix Tanks 1010 & 1011
430	EU-06C	Dispersion Load Premix Tanks 1750 & 1751
Dispersion Loading Mix Tanks		
212-214	006	Dispersion Mix (20 500 gal. tanks and three 10 gal. tanks)
229		
409-428		
428A		
Finished Product Make Tanks		
204	007	Finished Product Make Tanks
228-231		
233-234		
249-258		
294-298		
307		
228	EU-07B	Mix/Storage Tank
232	EU-07A	210S Tank
Tote Cleaning		
360	010A	Tote Cleaning-Portable Tank Washer
361	010B	Tote Cleaning-Tote Decant Tank
362	010C	Tote Cleaning-Portable Tank Rinse Station
363	010D	Tote Cleaning-Agitator Clean Tub
Lab Spray Booths		
175	EU-11(A)	Lab Spray Booth No. 1
176	EU-11(B)	Lab Spray Booth No. 2
178	EU-11(C)	Lab Spray Booth No. 3
Resin Manufacturing		
040	012	Resin Production
	031	GTP Resin Manufacturing
Pigment Handling		
880	EU-013-1	Pigment Handling
855	EU-013-2	Pigment Handling
	EU-033	SDP Ink Process
1040	EU-013-3	Pigment Handling

Emission Point Number(s)	Associated Emission Unit Number(s)	Associated Emission Unit Description
<i>Outdoor Storage Tanks 9 and 12</i>		
720	EU-14(720)	Outdoor Storage Tank T-9
384	EU-14(384)	Outdoor Storage Tank T-12
946	EU-14(946)	Outdoor Storage Tank T-38
068	EU-16(68)	Resin Storage Tank (16-226)
963	EU-17	Latex Resin Machine
<i>Thinner Blending and Filling</i>		
306	EU-18-1	Thinner Blend Tank 2
	EU-18-2	Thinner Blend Tank 40
	EU-19-1	Thinner Filling Machine 1
	EU-19-2	Thinner Filling Machine 2
873	EU-20	Drum & Tote Filling (Uniresin)
<i>Ink Manufacturing Tanks</i>		
1000	EU-24(1000)	Ink Manufacturing (Feed Tank (48))
1001	EU-24(1001)	Ink Manufacturing (Batch Tank (51))
1002	EU-24(1002)	Ink Manufacturing (Batch Tank (99))
1003	EU-24(1003)	Ink Manufacturing (Premix Tank (44))
1004	EU-24(1004)	Ink Manufacturing (Premix Tank (45))
1005	EU-24(1005)	Ink Manufacturing (Premix Tank (60))
1006	EU-24(1006)	Ink Manufacturing (Premix Tank (61))
1007	EU-24(1007)	Ink Manufacturing (Premix Tank (62))
1008	EU-24(1008)	Ink Manufacturing (Vehicle Tank (19))
1009	EU-24(1009)	Ink Manufacturing (Vehicle Tank (63))
1010	EU-24(1010)	Ink Manufacturing (Vehicle Tank (65))
1011	EU-24(1011)	Ink Manufacturing (Ink Tank (18))
1012	EU-24(1012)	Ink Manufacturing (Ink Tank (66))
1013	EU-24(1013)	Ink Manufacturing (Ink Tank (71))
1014	EU-24(1014)	Ink Manufacturing (Ink Tank (76))
<i>Boilers</i>		
940	EU-25-1(gas)	Boiler No. 1-Natural Gas Combustion
	EU-25-1(oil)	Boiler No. 1-Fuel Oil Combustion
	EU-25-2(gas)	Boiler No. 2-Natural Gas Combustion
	EU-25-2(oil)	Boiler No. 2-Fuel Oil Combustion
1100	033	SDP Ink Process

Insignificant Equipment List

Insignificant Emission Unit Number	Insignificant Emission Unit Description
EU-100	Cold Solvent Cleaning
EU-101	Maintenance Welding
EU-14(381)	Outdoor Storage Tank (T-11) (12,000 gal.)
EU-14(392)	Outdoor Storage Tank (T-4) (12,000 gal.)
EU-14(399)	Outdoor Storage Tank (T-2) (12,000 gal.)
EU-14(507) ⁽¹⁾	Outdoor Storage Tank (T-3) (12,030 gal.)
EU-14(551)	Outdoor Storage Tank (T-39) (8,500) gal.)
EU-14(552)	Outdoor Storage Tank (T-26) (36,000 gal.)
EU-14(554)	Outdoor Storage Tank (T-1) (12,000 gal.)
EU-14(565)	Outdoor Storage Tank (T-25) (20,000 gal.)
EU-14(721)	Outdoor Storage Tank (T-7) (12,000 gal.)
EU-14(725)	Outdoor Storage Tank (T-34) (26,000 gal.)
EU-14(727)	Outdoor Storage Tank (T-21) (20,000 gal.)
EU-14(728)	Outdoor Storage Tank (T-23) (20,000 gal.)
EU-14(733)	Outdoor Storage Tank (T-29) (32,500 gal.)
EU-14(736)	Outdoor Storage Tank (T-32) (13,652 gal.)
EU-14(739)	Outdoor Storage Tank (T-6) (12,000 gal.)
EU-14(743) ⁽²⁾	Outdoor Storage Tank (T-8) (12,000 gal.)
EU-14(745) ⁽³⁾	Outdoor Storage Tank T-33 (15,000 gal.)
EU-14(748)	Outdoor Storage Tank (T-13) (16,500 gal.)
EU-14(947) ⁽⁴⁾	Outdoor Storage Tank (T-15) (16,000 gal.)
EU-14(1050) ⁽⁵⁾	Outdoor Storage Tank (T-50) (20,000 gal.)
EU-14(1051) ⁽⁶⁾	Outdoor Storage Tank (T-51) (20,000 gal)
EU-14(1052) ⁽⁷⁾	Outdoor Storage Tank (T-52) (20,000 gal)
EU-14(1053) ⁽⁸⁾	Outdoor Storage Tank (T-53) (20,000 gal)
EU-14(1054) ⁽⁹⁾	Outdoor Storage Tank (T-54) (25,000 gal)

1)IDNR Construction Permit 90-A-381 for this emission unit does not contain any specific terms or conditions, therefore the emission unit qualifies as an insignificant activity per 567 IAC 22.103.

2)IDNR Construction permit 93-A-125-S2 for this emission unit does not contain any specific terms or conditions, therefore the emission unit qualifies as an insignificant activity per 567 IAC 22.103.

3)IDNR Construction permit 97-A-660-S1 for this emission unit does not contain any specific terms or conditions, therefore the emission unit qualifies as an insignificant activity per 567 IAC 22.103.

4)IDNR Construction permit 01A-842 for this emission unit does not contain any specific terms or conditions, therefore the emission unit qualifies as an insignificant activity per 567 IAC 22.103.

5)IDNR Construction permit 02-A-171 for this emission unit does not contain any specific terms or conditions, therefore the emission unit qualifies as an insignificant activity per 567 IAC 22.103.

6)IDNR Construction permit 02-A-172 for this emission unit does not contain any specific terms or conditions, therefore the emission unit qualifies as an insignificant activity per 567 IAC 22.103.

7)IDNR Construction permit 02-A-173 for this emission unit does not contain any specific terms or conditions, therefore the emission unit qualifies as an insignificant activity per 567 IAC 22.103.

8)IDNR Construction permit 02-A-174 for this emission unit does not contain any specific terms or conditions, therefore the emission unit qualifies as an insignificant activity per 567 IAC 22.103.

9)IDNR Construction permit 02-A-175 for this emission unit does not contain any specific terms or conditions, therefore the emission unit qualifies as an insignificant activity per 567 IAC 22.103.

Insignificant Emission Unit Number	Insignificant Emission Unit Description
EU-14(1055) ⁽¹⁰⁾	Outdoor Storage Tank (T-55) (20,000 gal)
EU-14(1056) ⁽¹¹⁾	Outdoor Storage Tank (T-56) (20,000 gal)
EU-14(1057) ⁽¹²⁾	Outdoor Storage Tank (T-57) (20,000 gal)
EU-14(1062)	Outdoor Storage Tank (T-62) (12,000 gal.)
EU-14(1063)	Outdoor Storage Tank (T-63) (12,000 gal.)
EU-14(1070)	Outdoor Storage Tank (T-70) (12,000 gal.)
EU-14(1071)	Outdoor Storage Tank (T-71) (12,000 gal.)
EU-14(1075)	Outdoor Storage Tank (T-75) (20,000 gal.)
EU-14(1076)	Outdoor Storage Tank (T-76) (20,000 gal.)
EU-14(1077)	Outdoor Storage Tank (T-77) (20,000 gal.)
EU-14(1078)	Outdoor Storage Tank (T-78) (20,000 gal.)
EU-14(1079)	Outdoor Storage Tank (T-79) (12,000 gal.)
EU-14(1080)	Outdoor Storage Tank (T-80) (12,000 gal.)
EU-14(702)	Outdoor Storage Tank T-10 (12,030 gal)
EU-14(555)	Outdoor Storage Tank T-24 (25,882 gal.)
EU-14(41)	Outdoor Storage Tank T-41 (8,500 gal.)
EU-14(42)	Outdoor Storage Tank T-42 (7,650 gal.)
EU-16(70)	Resin Storage Tank (11-221) (11,000 gal)
EU-16(71)	Resin Storage Tank (11-211) (11,000 gal)
EU-16(73)	Resin Storage Tank (11-232) (11,000 gal)
EU-16(74)	Resin Storage Tank (11-233) (11,000 gal)
EU-16(75)	Resin Storage Tank (11-234) (11,000 gal)
EU-16(76)	Resin Storage Tank (11-235) (11,000 gal)
EU-16(77)	Resin Storage Tank (11-245) (11,000 gal)
EU-16(78)	Resin Storage Tank (11-222) (11,000 gal)
EU-16(79)	Resin Storage Tank (11-223) (11,000 gal)
EU-16(80)	Resin Storage Tank (11-212) (11,000 gal)
EU-16(81)	Resin Storage Tank (11-224) (11,000 gal)
EU-16(82)	Resin Storage Tank (11-225) (11,000 gal)
EU-16(83)	Resin Storage Tank (11-243) (11,000 gal)
EU-16(84)	Resin Storage Tank (11-244) (11,000 gal)
EU-16(85)	Resin Storage Tank (11-213) (11,000 gal)
EU-16(86)	Resin Storage Tank (11-214) (11,000 gal)
EU-16(87)	Resin Storage Tank (11-215) (11,000 gal)
EU-16(88)	Resin Storage Tank (11-241) (11,000 gal)
EU-16(89)	Resin Storage Tank (11-222) (11,000 gal)
EU-16(90)	Resin Storage Tank (16-217) (16,000 gal)

10)IDNR Construction permit 02-A-176 for this emission unit does not contain any specific terms or conditions, therefore the emission unit qualifies as an insignificant activity per 567 IAC 22.103.

11)IDNR Construction permit 02-A-177 for this emission unit does not contain any specific terms or conditions, therefore the emission unit qualifies as an insignificant activity per 567 IAC 22.103.

12)IDNR Construction permit 02-A-178 for this emission unit does not contain any specific terms or conditions, therefore the emission unit qualifies as an insignificant activity per 567 IAC 22.103.

Insignificant Emission Unit Number	Insignificant Emission Unit Description
EU-16(91)	Resin Storage Tank (16-216) (16,000 gal)
EU-16(92)	Resin Storage Tank (16-246) (16,000 gal)
EU-16(93)	Resin Storage Tank (16-247) (16,000 gal)
EU-16(94)	Resin Storage Tank (16-236) (16,000 gal)
EU-16(95)	Resin Storage Tank (16-237) (16,000 gal)
EU-21(D)	Diesel Tank (500 gal.)
EU-21(G)	Gasoline Tank (500 gal.)
EU-26-1	Dowtherm Boiler 1
EU-26-2	Dowtherm Boiler 2
EU-27-1	Inert Gas Generator #1
EU-27-2	Inert Gas Generator #2
EU-28	Wastewater Hold Tanks
EU-5000	Emergency Generator (29.39 BHP/hr)
EU-5001	Fire Foam Pump (1.43 BHP/hr)
EU-5002	Fire Water Pump East (13.3 BHP/hr)
EU-5003	Emergency Generator (33.11 BHP/hr)

II. Plant-Wide Conditions

Facility Name: DuPont Performance Coatings
Permit Number: 03-TV-035

Permit conditions are established in accord with 567 Iowa Administrative Code rule 22.108

Permit Duration

The term of this permit is: Five (5) Years
Commencing on: November 25, 2003
Ending on: November 24, 2008

Amendments, modifications and reopenings of the permit shall be obtained in accordance with 567 Iowa Administrative Code rules 22.110 - 22.114. Permits may be suspended, terminated, or revoked as specified in 567 Iowa Administrative Code Rules 22.115.

Emission Limits

Unless specified otherwise in the Source Specific Conditions, the following limitations and supporting regulations apply to all emission points at this plant:

Opacity (visible emissions): 40% opacity
Authority for Requirement: 567 IAC 23.3(2)"d"

Sulfur Dioxide (SO₂): 500 parts per million by volume
Authority for Requirement: 567 IAC 23.3(3)"e"

Particulate Matter (state enforceable only)¹:

No person shall cause or allow the emission of particulate matter from any source in excess of the emission standards specified in this chapter, except as provided in 567 – Chapter 24. For sources constructed, modified or reconstructed after July 21, 1999, the emission of particulate matter from any process shall not exceed an emission standard of 0.1 grain per dry standard cubic foot of exhaust gas, except as provided in 567 – 21.2(455B), 23.1(455B), 23.4(455B) and 567 – Chapter 24.

For sources constructed, modified or reconstructed prior to July 21, 1999, the emission of particulate matter from any process shall not exceed the amount determined from Table I, or amount specified in a permit if based on an emission standard of 0.1 grain per standard cubic foot of exhaust gas or established from standards provided in 23.1(455B) and 23.4(455B).

Authority for Requirement: 567 IAC 23.3(2)"a" (as revised 7/21/1999)

¹ This is the current language in the Iowa Administrative Code (IAC). This version of the rule is awaiting EPA approval to become part of Iowa's State Implementation Plan (SIP). When EPA approves this rule, it will replace the older version and will be considered federally enforceable.

Particulate Matter (federally enforceable)²:

The emission of particulate matter from any process shall not exceed the amount determined from Table I, except as provided in 567 — 21.2(455B), 23.1(455B), 23.4(455B) and 567 — Chapter 24. If the director determines that a process complying with the emission rates specified in Table I is causing or will cause air pollution in a specific area of the state, an emission standard of 0.1 grain per standard cubic foot of exhaust gas may be imposed.

Authority for Requirement: 567 IAC 23.3(2)"a" (prior to 7/21/1999)

Fugitive Dust: Attainment and Unclassified Areas - No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered repaired or demolished, with the exception of farming operations or dust generated by ordinary travel on unpaved public roads, without taking reasonable precautions to prevent particulate matter in quantities sufficient to create a nuisance, as defined in Iowa Code section 657.1, from becoming airborne. All persons, with the above exceptions, shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate. The highway authority shall be responsible for taking corrective action in those cases where said authority has received complaints of or has actual knowledge of dust conditions which require abatement pursuant to this subrule. Reasonable precautions may include, but not limited to, the following procedures.

1. Use, where practical, of water or chemicals for control of dusts in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land.
2. Application of suitable materials, such as but not limited to asphalt, oil, water or chemicals on unpaved roads, material stockpiles, race tracks and other surfaces which can give rise to airborne dusts.
3. Installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials, such as but not limited to grain, fertilizers or limestone.
4. Covering at all times when in motion, open-bodied vehicles transporting materials likely to give rise to airborne dusts.
5. Prompt removal of earth or other material from paved streets or to which earth or other material has been transported by trucking or earth-moving equipment, erosion by water or other means.

Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan

The owner/operator shall comply with the applicable requirements listed below. The compliance status is based on information provided by the applicant.

Unless otherwise noted in Section III of this permit, DuPont Performance Coatings is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which become effective during the permit term, DuPont Performance Coatings shall comply with such requirements in a timely manner.

Authority for Requirement: 567 IAC 22.108(15)

² This is the current language in the Iowa SIP, and is enforceable by EPA.

Section 112(j) of the Clean Air Act (MACT Hammer) Compliance Plan

On May 15, 2002, DuPont Performance Coatings submitted Part 1 MACT applications to IDNR, indicating that the facility may be subject to the MACT standards for Industrial, Commercial and Institutional Boilers and Process Heaters, Miscellaneous Organic Chemical Production and Processes, and Organic Liquids Distribution, 40 CFR 63 Subparts DDDDD, FFFF, and EEEE, respectively, when they are promulgated. DuPont Performance Coatings must submit a Part 2 MACT application to the IDNR by the deadline specified in 40 CFR 63.52(e), if 40 CFR 63 Subparts DDDDD, FFFFF, and EEEE have not been promulgated by that date.

Authority for Requirement: 40 CFR 63.52; 567 IAC 23.1(4)"b"(2)

III. Emission Point-Specific Conditions

Facility Name: DuPont Performance Coatings

Permit Number: **03-TV-035**

Emission Point ID Number: See Table: Filling Floor Paint Manufacturing

Associated Equipment

Associated Emission Unit ID Numbers: See Table: Filling Floor Paint Manufacturing

Applicable Requirements

Table: Filling Floor-Paint Manufacturing

Emission Point Number	Associated Emission Unit Number	Emission Unit Description	Raw Material	Rated Capacity (Gal./hr)
811	EU-1A	Filling Floor Paint Manufacturing	Paint	278
815				
816				
817				
818				
819				
820				
825				

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

There are no emission limits at this time.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: See Table: Finish Product Let Down Tanks

Associated Equipment

Associated Emission Unit ID Numbers: See Table: Finish Product Let Down Tanks

Applicable Requirements

Table: Finish Product Let Down Tanks

Emission Point Number	Associated Emission Unit Number	Emission Unit Description	Raw Material	Rated Capacity (Gal./hr)
811	EU-1B	Finish Product Let Down Tanks	Paint	91.0
812				
815				
816				
817				
818				
819				
820				
824				
825				

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

There are no emission limits at this time.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

**Emission Point ID Number: See Table: Dispersion
Loading/Grinding/Mixing**

Associated Equipment

Associated Emission Unit ID Numbers: See Table: Dispersion Loading/Grinding/Mixing

Applicable Requirements

Table: Dispersion Loading/Grinding/Mixing

Emission Point Number	Associated Emission Unit Number	Emission Unit Description	Raw Material	Rated Capacity (Gal./hr)
801	EU-1C	Dispersion Loading/Grinding/Mixing	Paint	235.35
802				
803				
804				
805				
807				
808				
811				
812				
813				
818				
819				
820				
824				
825				

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

There are no emission limits at this time.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 156

Associated Equipment

Associated Emission Unit ID Numbers: See Table: Solvent Recovery System

Emissions Control Equipment ID Number: See Table: Solvent Recovery System

Emissions Control Equipment Description: See Table: Solvent Recovery System

Applicable Requirements

Table: Solvent Recovery System

Emission Unit Number	Emission Unit Description	Control Equipment Number	Control Equipment Description	Raw Material	Rated Capacity (gal./hr)
002-CRS	Clean Solvent Tank	002c	Condenser	Used Solvent	4,000
002-DRS-1	Dirty Solvent Tank 1				
002-DRS-2	Dirty Solvent Tank 2				
002-PT	Paint Tank				
002-ST	Sludge Tank				
002-TFE	Storage Tank				

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 5%

Authority for Requirement: Iowa DNR Construction Permit 94-A-179
567 IAC 23.3(2)"d"

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet): 24

Stack Diameter (inches): 3

Stack Exhaust Flow Rate (cfm): 25

Stack Temperature (°F): 70

Vertical, Unobstructed Discharge Required: Yes ☐ No ☒

Authority for Requirement: Iowa DNR Construction Permit 94-A-179

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point

design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Numbers: See Table: Thinner Blend Tanks

Associated Equipment

Associated Emission Unit ID Numbers: See Table: Thinner Blend Tanks

Applicable Requirements

Table: Thinner Blend Tanks

Emission Point Number	Associated Emission Unit Number	Control Equipment Number	Control Equipment Description	Emission Unit Description	Raw Material/Fuel	Rated Capacity (gal./hr)	Construction Permit No.
450	EU-03(3702)	3-1(3702)	Vent Condenser	Thinner Blend Tank	Solvent	350	91-A-263
451	EU-03(3703)	3-1(3703)	Vent Condenser	Thinner Blend Tank	Solvent	350	91-A-264
452	EU-03(15107)	3-1(15107)	Vent Condenser	Thinner Blend Tank	Solvent	1,480	91-A-268
453	EU-03(10104)	3-1(10104)	Vent Condenser	Thinner Blend Tank	Solvent	990	91-A-265
454	EU-03(15106)	3-1(15106)	Vent Condenser	Thinner Blend Tank	Solvent	1,480	91-A-267
455	EU-03(15108)	3-1(15108)	Vent Condenser	Thinner Blend Tank	Solvent	1,480	91-A-269
456	EU-03(3701)	3-1(3701)	Vent Condenser	Thinner Blend Tank	Solvent	350	91-A-262
457	EU-03(15105)	3-1(15105)	Vent Condenser	Thinner Blend Tank	Solvent	1,480	91-A-266

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

There are no emission limits at this time.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: See Table: Thinner Drum & Tote Filling

Associated Equipment

Associated Emission Unit ID Numbers: See Table: Thinner Drum & Tote Filling

Applicable Requirements

Table: Thinner Drum & Tote Filling

Emission Point Number	Associated Emission Unit Number	Emission Unit Description	Raw Material	Rated Capacity (Gal./hr)
845	004	Thinner Drum & Tote Filling	Solvent	990
846				
847				

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

There are no emission limits at this time.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: See Table: Dispersion Loading Premix Tanks

Associated Equipment

Associated Emission Unit ID Numbers: See Table: Dispersion Loading Premix Tanks

Applicable Requirements

Table: Dispersion Loading Premix Tanks

Emission Point Number	Associated Emission Unit Number	Emission Unit Description	Raw Material	Tank Size	Construction Permit No.
429B	EU-06A	Dispersion Load Premix Tanks 47203 & 47204	Solvents	200 gal. each	91-A-274
407	EU-06B	Dispersion Load Premix Tanks 1010 & 1011		1,300 gal. each	90-A-224
430	EU-06C	Dispersion Load Premix Tanks 1750 & 1751		1,750 gal. each	90-A-225

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

There are no emission limits at this time.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: See Table: Dispersion Loading Mix Tanks

Associated Equipment

Associated Emission Unit ID Numbers: See Table: Dispersion Loading Mix Tanks

Applicable Requirements

Table: Dispersion Loading Mix Tanks

Emission Point Number	Associated Emission Unit Number	Emission Unit Description	Raw Material	Rated Capacity (TPH)
212-214	006	Dispersion Mix (twenty 500 gal tanks and three 10 gal. tanks)	Paint	11.94
229				
409 - 428				
428A				

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

There are no emission limits at this time.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: See Table: Finished Product Make Tanks

Associated Equipment

Associated Emission Unit ID Numbers: See Table: Finished Product Make Tanks

Applicable Requirements

Table: Finished Product Make Tanks

Emission Point Number	Associated Emission Unit Number	Emission Unit Description	Raw Material	Rated Capacity	Construction Permit #
204	007	Finished Product Make Tanks	Solvent	6,100 lb./hr	N/A
228-231					
233-234					
249-258					
294-298					
307					
228	EU-07B	Mix/Storage Tank	Solvent	9,137 gal.	00-A-208
232	EU-07A	210S Tank	Solvent	1,300 gal.	91-A-275

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from each emission points shall not exceed the levels specified below.

There are no emission limits at this time.

Operational Limits & Requirements (For EP228/EU-07B only)

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput:

1. The twelve-month total, rolled monthly, use of liquids in this storage tank shall not exceed 1,200,000 gallons.

Reporting & Record keeping: All records required below shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

1. The permit holder shall maintain records on the premises to show the twelve-month, rolled monthly, use of liquids in this mix/storage tank (EU-07B). Annual amounts of liquids shall be recorded in gallons.
2. The permit holder shall also monitor the usage of compounds containing Hazardous Air Pollutants (HAP's) and record the respective amount of any HAP. Annual emission totals for each HAP shall be recorded in tons.

Authority for Requirement: Iowa DNR Construction Permit 00-A-208

Emission Point Characteristics (For EP-228 only).

The emission point shall conform to the specifications listed below.

Stack Height (feet): 49

Stack Diameter (inches): 2

Stack Exhaust Flow Rate (scfm): 1.5

Stack Temperature (°F): 68

Discharge Style: Vertical with obstructing raincap

Authority for Requirement: Iowa DNR Construction Permit 00-A-208

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: See Table: Tote Cleaning

Associated Equipment

Associated Emission Unit ID Numbers: See Table: Tote Cleaning

Applicable Requirements

Table: Tote Cleaning

Emission Point Number	Associated Emission Unit Number	Emission Unit Description	Raw Material	Rated Capacity (Gal./hr)
360	010A	Tote Cleaning-Portable Tank Washer	Solvent	57.75
361	010B	Tote Cleaning-Tote Decant Tank		57.75
362	010C	Tote Cleaning-Portable Tank Rinse Station		57.75
363	010D	Tote Cleaning-Agitator Clean Tub		57.75

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

Table: Tote Cleaning – Emission Limits

Emission Point Number	Associated Emission Unit Number	VOC Limit (TPY)	Authority for Requirement (Construction Permit No.)
360	010A	2.452	93-A-128
361	010B	0.111	93-A-129
362	010C	1.896	93-A-130
363	010D	6.43	93-A-131

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput:

1. The amount of solvent used in this process shall not exceed 3,500 gallons per twelve (12)-month rolling period.

Reporting & Record keeping: All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The records shall show the following:

1. For the first twelve (12) months of operation, determine the total amount of solvent usage (in gallons/month) for each month of operation.

2. After the first twelve (12) months of operation, determine the annual solvent usage (in gallons/yr.) on a rolling-12-month basis for each month of operation.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point Characteristics

The emission points shall conform to the specifications listed below.

Table: Tote Cleaning – Emission Point Characteristics

Emission Point Number	Associated Emission Unit Number	Construction Permit No.	Stack Characteristics				
			Height (feet)	Diameter (inches)	Exhaust Flowrate (cfm)	Exhaust Temp. (°F)	Vertical Unobstructed Discharge Required?
360	010A	93-A-128	22.0	NA	50	Ambient	No
361	010B	93-A-129	25.0	NA	5.35	Ambient	No
362	010C	93-A-130	25.0	NA	50	Ambient	No
363	010D	93-A-131	25.0	NA	1,500	Ambient	No

Authority for Requirement: Iowa DNR Construction Permits specified in Table: Tote Cleaning – Emission Point Characteristics

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: See Table: Lab Spray Booths

Associated Equipment

Associated Emission Unit ID Numbers: See Table: Lab Spray Booths

Applicable Requirements

Table: Lab Spray Booths

Emission Point Number	Associated Emission Unit Number	Control Equipment Number	Control Equipment Description	Emission Unit Description	Raw Material/Fuel	Rated Capacity (lb./hr)	Construction Permit #
175	EU-11(A)	011-1A	Dry Filter Panels	Lab Spray Booth No. 1	Paint	2.05	93-A-016
176	EU-11(B)	011-1B	Dry Filter Panels	Lab Spray Booth No. 2		2.05	93-A-017
178	EU-11(C)	011-1C	Dry Filter Panels	Lab Spray Booth No. 3		2.05	93-A-018

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

Table: Lab Spray Booths – Emission Limits

Emission Point Number	Associated Emission Unit Number	Opacity Limit	PM Limit			Construction Permit #
			gr./scf	lb./hr	TPY	
175	EU-11(A)	40%	0.01	0.14	0.6	93-A-016
176	EU-11(B)	40%	0.01	0.14	0.6	93-A-017
178	EU-11(C)	40%	0.01	0.14	0.6	93-A-018

Pollutant: Opacity

Emission Limit(s): 40 %

Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter

Emission Limit(s): 0.01 gr/scf , 0.14 lb./hr, and 0.6 TPY

Authority for Requirement: Iowa DNR Construction Permits specified in Table: Lab Spray Booths - Emission Limits
567 IAC 23.4(13)

Emission Point Characteristics

These emission points shall conform to the specifications listed below.

Stack Height (feet): 54

Stack Diameter (inches): 18

Stack Exhaust Flow Rate (scfm): 1,600

Stack Temperature (°F): 75

Vertical, Unobstructed Discharge Required: Yes ☐ No ☒

The sources shall be identified by permanent labels both in the plant and at the emission point on the roof.

Authority for Requirement: Iowa DNR Construction Permits specified in Table: Lab Spray
Booths - Emission Limits

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☒ No ☐

Relevant requirements of O & M plan for this equipment: Particulate Matter

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

Spray Booth Filter Agency Operation & Maintenance Plan

Weekly

- Inspect the spray booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.
- Maintain a written record of the observation and any action resulting from the inspection.

Record Keeping and Reporting

Maintenance and inspection records will be kept for five years and available upon request.

Quality Control

- The filter equipment will be operated and maintained according to the manufacturers recommendations.

Emission Point ID Number: 040

Associated Equipment

Associated Emission Unit ID Numbers: See Table: Resin Manufacturing

Applicable Requirements

Table: Resin Manufacturing

Emission Unit Number	Emission Unit Description	Raw Material	Rated Capacity
012	Resin Production	Resin Components	7,700 lb./hr
031	GTP Resin Manufacturing	Resin	0.08 Batch/hr

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from these emission units shall not exceed the levels specified below.

Table: Resin Manufacturing – Emission Limits

Emission Unit Number	VOC Limit (TPY)	Authority for Requirement (Construction Permit No.)
012	39.4	98-A-023
031		

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet): 100

Stack Diameter (inches): 2

Stack Exhaust Flow Rate (scfm): 62.5

Stack Temperature (°F): Ambient

Vertical, Unobstructed Discharge Required: Yes ☐ No ☒

Authority for Requirement: Iowa DNR Construction Permit 98-A-023

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: See Table: Pigment Handling

Associated Equipment

Associated Emission Unit ID Numbers: See Table: Pigment Handling

Emissions Control Equipment ID Number: See Table: Pigment Handling

Emissions Control Equipment Description: See Table: Pigment Handling

Applicable Requirements

Table: Pigment Handling

Emission Point Number	Associated Emission Unit Number	Control Equipment Number	Control Equipment Description	Emission Unit Description	Raw Material	Rated Capacity
880	EU-013-1	13-1	Baghouse	Pigment Handling	Dry Pigment	294 lb./hr
855	EU-013-2	13-2	Baghouse	Pigment Handling	Dry Pigment	294 lb./hr
	033			SDP Ink Process	Dry Pigment	456 lb./hr
1040	EU-013-3	13-3	Baghouse	Pigment Handling	Dry Pigment	294 lb./hr

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

Table: Pigment Handling – Emission Limits

Emission Point Number	Associated Emission Unit Number	Opacity Limit	PM Limit	PM ₁₀ Limit	Construction Permit #
880	EU-013-1	40%	0.1 gr./scf	N/A	85-A-001
855	EU-013-2	40% ⁽¹⁾	1.0 lb./hr ⁽²⁾ and 0.1 gr./dscf	1.0 lb./hr ⁽²⁾	95-A-133-S1
	033				
1040	EU-013-3	40%	0.1 gr./scf	N/A	N/A

⁽¹⁾ Per DNR Air Quality Policy 3-b-08, Opacity Limits, an exceedence of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

⁽²⁾ Standard is expressed as the average of 3 runs.

Pollutant: Opacity

Emission Limit(s): 40%

Authority for Requirement: Iowa DNR Construction Permits listed in Table: Pigment Handling-
Emission Limits
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM)

Emission Limit(s): See Table: Pigment Handling – Emission Limits

Authority for Requirement: Iowa DNR Construction Permits listed in Table: Pigment Handling-
Emission Limits
567 IAC 23.3(2)

Pollutant: PM₁₀

Emission Limit(s): See Table: Pigment Handling-Emission Limits

Authority for Requirement: Iowa DNR Construction Permit 95-A-133

Emission Point Characteristics(For Emission Point 855 only.)

The emission point shall conform to the specifications listed below.

Stack Height (feet): 50.0

Stack Diameter (inches): 20

Stack Exhaust Flow Rate (scfm): 7,800

Stack Temperature (°F): 80

Vertical, Unobstructed Discharge Required: Yes ☐ No ☒

Authority for Requirement: Iowa DNR Construction Permit 95-A-133-S1

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☒ No ☐

Required for each baghouse.

must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Numbers: See Table: Outdoor Storage Tanks 9 and 12

Associated Equipment

Associated Emission Unit ID Numbers: See Table: Outdoor Storage Tanks 9 and 12

Applicable Requirements

Table: Outdoor Storage Tanks 9 and 12

Emission Point Number	Associated Emission Unit Number	Emission Unit Description	Raw Material	Tank Size
720	EU-14(720)	Outdoor Storage Tank (T-9)	Ethy3-3-Ethoxyl Propinat	11,660 gal.
384	EU-14(384)	Outdoor Storage Tank (T-12)	MiBK	11,660 gal.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

Table: Outdoor Storage Tanks 9 and 12 – Emission Limits

Emission Point Number	Associated Emission Unit Number	VOC Limit (TPY)	Authority for Requirement (Construction Permit No.)
720	EU-14(720)	0.006	93-A-126
384	EU-14(384)	0.059	93-A-127

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput: These tanks are limited to containing Ethyl3-3-Ethoxyl Propinat (Tank T-9) and MiBK (Tank T-12) only.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point Characteristics

Each emission point shall conform to the specifications listed below.

Stack Height (feet): 11.0

Stack Diameter (inches): 4.0

Stack Exhaust Flow Rate (cfm): 13.37

Stack Temperature (°F): Ambient

Vertical, Unobstructed Discharge Required: Yes ☐ No ☒

Authority for Requirement: Iowa DNR Construction Permits specified in Table: Outdoor
Storage Tanks 9 and 12 – Emission Limits

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 946

Associated Equipment

Associated Emission Unit ID Numbers: EU-14(946)

Applicable Requirements

Emission Unit vented through this Emission Point: EU-14(946)

Emission Unit Description: Outdoor Storage Tank (T-38)

Raw Material/Fuel: hydroxypropyl acrylate

Rated Capacity: 10,000 gal. tank

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

There are no emission limits at this time.

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput:

1. The HPA storage tank throughput shall not exceed 150,000 gallons of hydroxypropyl acrylate (HPA) during any rolling twelve (12) month period of time.
2. The total methacrylic/acrylic acid content of the HPA shall not exceed 1.2 percent (%) by weight.

Reporting & Record keeping:

1. Records of both material flow and acrylic acid content shall be kept for possible Departmental review for a rolling period of five (5) years.

Authority for Requirement: Iowa DNR Construction Permit 90-A-211

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 068

Associated Equipment

Associated Emission Unit ID Numbers: EU-16(68)

Applicable Requirements

Emission Unit vented through this Emission Point: EU-16(68)

Emission Unit Description: Resin Storage Tank (16-226)

Raw Material/Fuel: RCH-65605

Rated Capacity: 16,000 gal. tank

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

There are no emission limits at this time.

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Reporting & Record keeping: All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

1. A record of each material stored in this unit shall be maintained.
2. At the end of each month, the throughput of each material stored during the previous month shall be recorded. The throughput of each material stored during the previous twelve (12) months shall also be recorded at the end of each month.

Authority for Requirement: Iowa DNR Construction Permit 00-A-1038

Emission Point Characteristics (For Emission Point 068 only)

The emission point shall conform to the specifications listed below.

Stack Height (feet): 44

Stack Diameter (inches): 4

Stack Exhaust Flow Rate (acfm): See Note Below

Stack Temperature (°F): Ambient (68)

Discharge Style: Obstructed Vertical

Authority for Requirement: Iowa DNR Construction Permit 00-A-1038

Note: The exhaust from this unit consists of working and breathing losses. Actual flow rate will vary with tank utilization and atmospheric conditions.

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 963

Associated Equipment

Associated Emission Unit ID Numbers: EU-17

Emissions Control Equipment ID Number: 17-1

Emissions Control Equipment Description: Packed Column Scrubber

Applicable Requirements

Emission Unit vented through this Emission Point: EU-17

Emission Unit Description: Latex Resin Machine

Raw Material/Fuel: Resin

Rated Capacity: 3,000 gal. Reaction Vessel

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 7.3 lb./hr and 32 TPY

Authority for Requirement: Iowa DNR Construction Permit 88-A-112

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☒ No ☐

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 306

Associated Equipment

Associated Emission Unit ID Numbers: See Table: Thinner Blending and Filling

Applicable Requirements

Table: Thinner Blending and Filling

Emission Unit Number	Emission Unit Description	Raw Material	Rated Capacity/Size	Construction Permit #
EU-18-1	Thinner Blend Tank 2	Solvent	2,000 gal.	93-A-019
EU-18-2	Thinner Blend Tank 40	Solvent	400 gal.	
EU-19-1	Thinner Filling Machine 1	Solvent	80 gal./min	
EU-19-2	Thinner Filling Machine 2	Solvent	80 gal./min	

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 43.432 lb./hr and 22.95 TPY

Authority for Requirement: Iowa DNR Construction Permit 93-A-019

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet): N/A

Stack Diameter (inches): 3

Stack Exhaust Flow Rate (scfm): 43

Stack Temperature (°F): 80

Vertical, Unobstructed Discharge Required: Yes ☐ No ☒

Authority for Requirement: Iowa DNR Construction Permit 93-A-019

The source shall be identified by permanent labels both in the plant and at the emission point on the roof.

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 873

Associated Equipment

Associated Emission Unit ID Number: EU-20

Applicable Requirements

Emission Unit vented through this Emission Point: EU-20
Emission Unit Description: Drum & Tote Filling (Uniresin)
Raw Material/Fuel: Uniresin
Rated Capacity: 120 gal./hr

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

There are no emission limits at this time.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: See Table: Ink Manufacturing Tanks

Associated Equipment

Associated Emission Unit ID Numbers: See Table: Ink Manufacturing Tanks

Applicable Requirements

Table: Ink Manufacturing Tanks

Emission Point Number	Associated Emission Unit Number	Emission Unit Description	Raw Material	Tank Size	Construction Permit #
1000	EU-24 (1000)	Ink Manufacturing (Feed Tank (48))	Solvent	538 gal.	95-A-477
1001	EU-24 (1001)	Ink Manufacturing (Batch Tank (51))		300 gal.	95-A-478
1002	EU-24 (1002)	Ink Manufacturing (Batch Tank (99))		538 gal.	95-A-479
1003	EU-24 (1003)	Ink Manufacturing (Premix Tank (44))		2,700 gal.	95-A-480
1004	EU-24 (1004)	Ink Manufacturing (Premix Tank (45))		2,700 gal.	95-A-481
1005	EU-24 (1005)	Ink Manufacturing (Premix Tank (60))		1,100 gal.	95-A-482
1006	EU-24 (1006)	Ink Manufacturing (Premix Tank (61))		1,100 gal.	95-A-483
1007	EU-24 (1007)	Ink Manufacturing (Premix Tank (62))		1,100 gal.	95-A-484
1008	EU-24 (1008)	Ink Manufacturing (Vehicle Tank (19))		6,000 gal.	95-A-485
1009	EU-24 (1009)	Ink Manufacturing (Vehicle Tank (63))		3,950 gal.	95-A-486
1010	EU-24 (1010)	Ink Manufacturing (Vehicle Tank (65))		3,950 gal.	95-A-487
1011	EU-24 (1011)	Ink Manufacturing (Ink Tank (18))		6,000 gal.	95-A-488
1012	EU-24 (1012)	Ink Manufacturing (Ink Tank (66))		4,600 gal.	95-A-489
1013	EU-24 (1013)	Ink Manufacturing (Ink Tank (71))		4,600 gal.	95-A-490
1014	EU-24 (1014)	Ink Manufacturing (Ink Tank (76))		4,600 gal.	95-A-491

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 1 TPY⁽¹⁾

Authority for Requirement: Iowa DNR Construction Permits specified in Table: Ink Manufacturing Tanks

⁽¹⁾Limit for **each** tank.

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Reporting & Record keeping: The owner or operator of these vessels shall keep records on-site for a minimum of five (5) years which show operations to be in compliance with the VOC emission limits listed above. These records shall include:

1. MSDS for each material stored in the tanks.
2. At the end of each month, the throughput of each material used in each tank during the previous month shall be recorded. The throughput of each material used in each tank during the previous twelve (12) months shall also be recorded at the end of each month.

Authority for Requirement: Iowa DNR Construction Permits specified in Table: Ink Manufacturing Tanks

Emission Point Characteristics

Each emission point shall conform to the specifications listed below.

Table: Ink Manufacturing Tanks - Emission Point Characteristics

Emission Point Number	Associated Emission Unit Number	Construction Permit #	Stack Characteristics				
			Height (feet)	Diameter (inches)	Exhaust Flowrate (cfm)	Exhaust Temp. (°F)	Discharge Style
1000	EU-24 (1000)	95-A-477	54	2	5	77	N/A
1001	EU-24 (1001)	95-A-478	54	2	5	77	N/A
1002	EU-24 (1002)	95-A-479	51	2	5	77	N/A
1003	EU-24 (1003)	95-A-480	54	2	5	77	N/A
1004	EU-24 (1004)	95-A-481	54	2	5	77	N/A
1005	EU-24 (1005)	95-A-482	51	3	5	77	N/A
1006	EU-24 (1006)	95-A-483	51	3	5	77	N/A
1007	EU-24 (1007)	95-A-484	51	2	5	77	N/A
1008	EU-24 (1008)	95-A-485	54	2	5	77	N/A
1009	EU-24 (1009)	95-A-486	51	2	5	77	N/A
1010	EU-24 (1010)	95-A-487	51	2	5	77	N/A
1011	EU-24 (1011)	95-A-488	51	2	5	77	N/A
1012	EU-24 (1012)	95-A-489	51	2	5	77	N/A
1013	EU-24 (1013)	95-A-490	52	2	5	77	N/A
1014	EU-24 (1014)	95-A-491	51	2	5	77	N/A

Authority for Requirement: Iowa DNR Construction Permits specified in Table: Ink Manufacturing Tanks-Emission Point Characteristics

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point

design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 940

Associated Equipment

Associated Emission Unit ID Numbers: See Table: Boilers

Emissions Control Equipment ID Number: See Table: Boilers

Applicable Requirements

Table: Boilers

Associated Emission Unit Number	Emission Unit Description	Raw Material	Rated Capacity	Construction Permit #
EU-25-1 (gas)	Boiler #1-Natural gas Combustion	Natural Gas	33.6 MMBtu/hr	91-A-290
EU-25-1 (oil)	Boiler #1-Fuel Oil Combustion	Fuel Oil		
EU-25-2 (gas)	Boiler #2-Natural gas Combustion	Natural Gas	33.6 MMBtu/hr	80-A-092-S1
EU-25-2 (oil)	Boiler #2-Fuel Oil Combustion	Fuel Oil		

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from each boiler shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 20%⁽¹⁾

Authority for Requirement: 567 IAC 23.1(2)"III"
40 CFR 60.43c(c)

⁽¹⁾(6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity.

Pollutant: Particulate Matter (PM)

Emission Limit(s): 21 lb./hr and 7.7 TPY⁽¹⁾

Authority for Requirement: Iowa DNR Construction Permits specified in Table: Boilers
Manufacturing Tanks

Pollutant: Sulfur Dioxide (SO₂)

Emission Limit(s): 15 lb./hr and 5.3 TPY⁽¹⁾

Authority for Requirement: Iowa DNR Construction Permits specified in Table: Boilers

⁽¹⁾Emission limits for **each** boiler.

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Hours of operation:

1. #2 fuel oil may not be used to fuel either source for more than 730 hours/year on a rolling total for the preceding twelve-months.

Authority for Requirement: Iowa DNR Construction Permits specified in Table: Boilers

Process throughput:

1. No person shall allow, cause or permit the combustion of number 1 or number 2 fuel oil exceeding a sulfur content of 0.5 percent by weight.

Authority for Requirement: 567 IAC 23.3(3)"b"(1)
567 IAC 23.1(2)"III"
40 CFR 60.42c(d)

2. Only natural gas and #2 fuel oil may be used to fire these sources.

Reporting & Record keeping:

The following records shall be maintained on-site for five (5) years and available for inspection upon request by representatives of the Department of Natural Resources:

1. Compliance on an ongoing basis shall be demonstrated by fuel supplier certification for all fuel oil deliveries which include the name of the supplier and a statement from the supplier that the oil complies with the specifications for #2 fuel oil as defined by in ASTM's Standard Specifications for Fuel Oils (ASTM D396-78).
2. A log of equipment usage shall be maintained on-site by operator personnel. The tabulation shall record type and amount of fuel used per day, per month and the annual rolling totals for the preceding year for each boiler.

Authority for Requirement: Iowa DNR Construction Permits specified in Table: Boilers
567 IAC 23.1(2)"III"
40 CFR 60.42c

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet): 101

Stack Diameter (feet): 11

Location: South of Building #9

Vertical, Unobstructed Discharge Required: Yes ☐ No ☒

Authority for Requirement: Iowa DNR Construction Permits specified in Table: Boilers

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

The following applies to these Emission Points *only while burning fuel oil*.

The facility shall check the opacity weekly during a period when the emission unit on this emission point is at or near full capacity and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. The facility shall use EPA Method 9 with a certified smoke reader for the monitoring method.

If an opacity > (20%) is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 1100

Associated Equipment

Associated Emission Unit ID Numbers: 033

Emissions Control Equipment ID Number: 033-1

Emissions Control Equipment Description: Ozone Destruction and Abatement Unit

Applicable Requirements

Emission Unit vented through this Emission Point: 033

Emission Unit Description: SDP Ink Process

Raw Material/Fuel: Ink

Rated Capacity: 1,750,000 gal./yr

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

There are no emission limits at this time.

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet): 86

Stack Diameter (inches): 30

Stack Exhaust Flow Rate (scfm): 17,000

Stack Temperature (°F): 80

Discharge Style: Vertical

Authority for Requirement: Iowa DNR Construction Permit 03-A-315

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

IV. General Conditions

This permit is issued under the authority of the Iowa Code subsection 455B.133(8) and in accordance with 567 Iowa Administrative Code chapter 22.

G1. Duty to Comply

1. The permittee must comply with all conditions of the Title V permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. *567 IAC 22.108(9)"a"*
2. Any compliance schedule shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based. *567 IAC 22.105 (2)"h"(3)*
3. Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall be enforceable by the administrator and are incorporated into this permit. *567 IAC 22.108 (1)"b"*
4. Unless specified as either "state enforceable only" or "local program enforceable only", all terms and conditions in the permit, including provisions to limit a source's potential to emit, are enforceable by the administrator and citizens under the Act. *567 IAC 22.108 (14)*
5. It shall not be a defense for a permittee, in an enforcement action, that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. *567 IAC 22.108 (9)"b"*

G2. Permit Expiration

1. Except as provided in 567 IAC 22.104, the expiration of this permit terminates the permittee's right to operate unless a timely and complete application has been submitted for renewal. Any testing required for renewal shall be completed before the application is submitted. *567 IAC 22.116(2)*
2. To be considered timely, the owner, operator, or designated representative (where applicable) of each source required to obtain a Title V permit shall present or mail the Air Quality Bureau, Iowa Department of Natural Resources, Air Quality Bureau, 7900 Hickman Rd, Suite #1, Urbandale, Iowa 50322, four or more copies of a complete permit application, at least 6 months but not more than 18 months prior to the date of permit expiration. The definition of a complete application is as indicated in 567 IAC 22.105(2). *567 IAC 22.105*

G3. Certification Requirement for Title V Related Documents

Any application, report, compliance certification or other document submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. All certifications shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. *567 IAC 22.107 (4)*

G4. Annual Compliance Certification

By March 31 of each year, the permittee shall submit compliance certifications for the previous calendar year. The certifications shall include descriptions of means to monitor the compliance status of all emissions sources including emissions limitations, standards, and work practices in accordance with applicable requirements. The certification for a source shall include the identification of each term or condition of the permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with all applicable department rules. For sources determined not to be in compliance at the time of compliance certification, a compliance schedule shall be submitted which provides for periodic progress reports, dates for achieving activities, milestones, and an explanation of why any dates were missed and preventive or corrective measures.

The compliance certification shall be submitted to the administrator, director, and the appropriate DNR Field office. 567 IAC 22.108 (15)"e"

G5. Semi-Annual Monitoring Report

By March 31 and September 30 of each year, the permittee shall submit a report of any monitoring required under this permit for the 6 month periods of July 1 to December 31 and January 1 to June 30, respectively. All instances of deviations from permit requirements must be clearly identified in these reports, and the report must be signed by a responsible official, consistent with 567 IAC 22.107(4). The semi-annual monitoring report shall be submitted to the director and the appropriate DNR Field office. 567 IAC 22.108 (5)

G6. Annual Fee

1. The permittee is required under subrule 567 IAC 22.106 to pay an annual fee based on the total tons of actual emissions of each regulated air pollutant. Beginning July 1, 1996, Title V operating permit fees will be paid on July 1 of each year. The fee shall be based on emissions for the previous calendar year.
2. The fee amount shall be calculated based on the first 4,000 tons of each regulated air pollutant emitted each year. The fee to be charged per ton of pollutant will be available from the department by June 1 of each year. The Responsible Official will be advised of any change in the annual fee per ton of pollutant.
3. The following forms shall be submitted annually by March 31 documenting actual emissions for the previous calendar year.
 - a. Form 1.0 "Facility Identification";
 - b. Form 4.0 "Emissions unit-actual operations and emissions" for each emission unit;
 - c. Form 5.0 "Title V annual emissions summary/fee"; and
 - d. Part 3 "Application certification."
4. The fee shall be submitted annually by July 1. The fee shall be submitted with the following forms:
 - a. Form 1.0 "Facility Identification";
 - b. Form 5.0 "Title V annual emissions summary/fee";
 - c. Part 3 "Application certification."
5. If there are any changes to the emission calculation form, the department shall make revised forms available to the public by January 1. If revised forms are not available by January 1, forms from the previous year may be used and the year of emissions documented changed. The department shall calculate the total statewide Title V emissions for the prior calendar year and make this information available to the public no later than April 30 of each year.
6. Phase I acid rain affected units under section 404 of the Act shall not be required to pay a fee for emissions which occur during the years 1993 through 1999 inclusive.
7. The fee for a portable emissions unit or stationary source which operates both in Iowa and out of state shall be calculated only for emissions from the source while operating in Iowa.
8. Failure to pay the appropriate Title V fee represents cause for revocation of the Title V permit as indicated in 567 IAC 22.115(1)"d".

G7. Inspection of Premises, Records, Equipment, Methods and Discharges

Upon presentation of proper credentials and any other documents as may be required by law, the permittee shall allow the director or the director's authorized representative to:

1. Enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
4. Sample or monitor, at reasonable times, substances or parameters for the purpose of ensuring compliance with the permit or other applicable requirements. *567 IAC 22.108 (15)"b"*

G8. Duty to Provide Information

The permittee shall furnish to the director, within a reasonable time, any information that the director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the director copies of records required to be kept by the permit, or for information claimed to be confidential, the permittee shall furnish such records directly to the administrator of EPA along with a claim of confidentiality. *567 IAC 22.108 (9)"e"*

G9. General Maintenance and Repair Duties

The owner or operator of any air emission source or control equipment shall:

1. Maintain and operate the equipment or control equipment at all times in a manner consistent with good practice for minimizing emissions.
2. Remedy any cause of excess emissions in an expeditious manner.
3. Minimize the amount and duration of any excess emission to the maximum extent possible during periods of such emissions. These measures may include but not be limited to the use of clean fuels, production cutbacks, or the use of alternate process units or, in the case of utilities, purchase of electrical power until repairs are completed.
4. Schedule, at a minimum, routine maintenance of equipment or control equipment during periods of process shutdowns to the maximum extent possible. *567 IAC 24.2(1)*

G10. Recordkeeping Requirements for Compliance Monitoring

1. In addition to any source specific recordkeeping requirements contained in this permit, the permittee shall maintain the following compliance monitoring records, where applicable:

- a. The date, place and time of sampling or measurements
- b. The date the analyses were performed.
- c. The company or entity that performed the analyses.
- d. The analytical techniques or methods used.
- e. The results of such analyses; and
- f. The operating conditions as existing at the time of sampling or measurement.
- g. The records of quality assurance for continuous compliance monitoring systems (including but not limited to quality control activities, audits and calibration drifts.)

2. The permittee shall retain records of all required compliance monitoring data and support information for a period of at least 5 years from the date of compliance monitoring sample, measurement report or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous compliance monitoring, and copies of all reports required by the permit.

3. For any source which in its application identified reasonably anticipated alternative operating scenarios, the permittee shall:

- a. Comply with all terms and conditions of this permit specific to each alternative scenario.
- b. Maintain a log at the permitted facility of the scenario under which it is operating.
- c. Consider the permit shield, if provided in this permit, to extend to all terms and conditions under each operating scenario. *567 IAC 22.108(4), 567 IAC 22.108(12)*

G11. Evidence used in establishing that a violation has or is occurring.

Notwithstanding any other provisions of these rules, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions herein.

1. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at a source:

- a. A monitoring method approved for the source and incorporated in an operating permit pursuant to 567 Chapter 22;
- b. Compliance test methods specified in 567 Chapter 25; or
- c. Testing or monitoring methods approved for the source in a construction permit issued pursuant to 567 Chapter 22.

2. The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:

- a. Any monitoring or testing methods provided in these rules; or
- b. Other testing, monitoring, or information gathering methods that produce information comparable to that produced by any method in subrule 21.5(1) or this subrule. *567 IAC 21.5(1)-567 IAC 21.5(2)*

G12. Prevention of Accidental Release: Risk Management Plan Notification and Compliance Certification

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Act, the permittee shall notify the department of this requirement. The plan shall be filed with all appropriate authorities by the deadline specified by EPA. A certification that this risk management plan is being properly implemented shall be included in the annual compliance certification of this permit. *567 IAC 22.108(6)*

G13. Hazardous Release

The permittee must report any situation involving the actual, imminent, or probable release of a hazardous substance into the atmosphere which, because of the quantity, strength and toxicity of the substance, creates an immediate or potential danger to the public health, safety or to the environment. A verbal report shall be made to the department at (515) 281-8694 and to the local police department or the office of the sheriff of the affected county as soon as possible but not later than six hours after the discovery or onset of the condition. This verbal report must be followed up with a written report as indicated in 567 IAC 131.2(2). *567 IAC Chapter 131-State Only*

G14. Excess Emissions and Excess Emissions Reporting Requirements

1. Excess Emissions. Excess emission during a period of startup, shutdown, or cleaning of control equipment is not a violation of the emission standard if the startup, shutdown or cleaning is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions. Cleaning of control equipment which does not require the shutdown of the process equipment shall be limited to one six-minute period per one-hour period. An incident of excess emission (other than an incident during startup, shutdown or cleaning of control equipment) is a violation. If the owner or operator of a source maintains that the incident of excess emission was due to a malfunction, the owner or operator must show that the conditions which caused the incident of excess emission were not preventable by reasonable maintenance and control measures. Determination of any subsequent enforcement action will be made following review of this report. If excess emissions are occurring, either the control equipment causing the excess emission shall be repaired in an expeditious manner or

the process generating the emissions shall be shutdown within a reasonable period of time. An expeditious manner is the time necessary to determine the cause of the excess emissions and to correct it within a reasonable period of time. A reasonable period of time is eight hours plus the period of time required to shut down the process without damaging the process equipment or control equipment. In the case of an electric utility, a reasonable period of time is eight hours plus the period of time until comparable generating capacity is available to meet consumer demand with the affected unit out of service, unless, the director shall, upon investigation, reasonably determine that continued operation constitutes an unjustifiable environmental hazard and issue an order that such operation is not in the public interest and require a process shutdown to commence immediately.

2. Excess Emissions Reporting

a. Oral Reporting of Excess Emissions. An incident of excess emission (other than an incident of excess emission during a period of startup, shutdown, or cleaning) shall be reported to the appropriate field office of the department within eight hours of, or at the start of the first working day following the onset of the incident. The reporting exemption for an incident of excess emission during startup, shutdown or cleaning does not relieve the owner or operator of a source with continuous monitoring equipment of the obligation of submitting reports required in 567-subrule 25.1(6). An oral report of excess emission is not required for a source with operational continuous monitoring equipment (as specified in 567-subrule 25.1(1)) if the incident of excess emission continues for less than 30 minutes and does not exceed the applicable visible emission standard by more than 10 percent opacity. The oral report may be made in person or by telephone and shall include as a minimum the following:

- i. The identity of the equipment or source operation from which the excess emission originated and the associated stack or emission point.
- ii. The estimated quantity of the excess emission.
- iii. The time and expected duration of the excess emission.
- iv. The cause of the excess emission.
- v. The steps being taken to remedy the excess emission.
- vi. The steps being taken to limit the excess emission in the interim period.

b. Written Reporting of Excess Emissions. A written report of an incident of excess emission shall be submitted as a follow-up to all required oral reports to the department within seven days of the onset of the upset condition, and shall include as a minimum the following:

- i. The identity of the equipment or source operation point from which the excess emission originated and the associated stack or emission point.
- ii. The estimated quantity of the excess emission.
- iii. The time and duration of the excess emission.
- iv. The cause of the excess emission.
- v. The steps that were taken to remedy and to prevent the recurrence of the incident of excess emission.
- vi. The steps that were taken to limit the excess emission.
- vii. If the owner claims that the excess emission was due to malfunction, documentation to support this claim. *567 IAC 24.1(1)-567 IAC 24.1(4)*

3. Emergency Defense for Excess Emissions. For the purposes of this permit, an “emergency” means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include non-compliance, to the extent caused by improperly designed equipment, lack of preventive maintenance,

careless or improper operation or operator error. An emergency constitutes an affirmative defense to an action brought for non-compliance with technology based limitations if it can be demonstrated through properly signed contemporaneous operating logs or other relevant evidence that:

- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b. The facility at the time was being properly operated;
- c. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements of the permit; and
- d. The permittee submitted notice of the emergency to the director by certified mail within two working days of the time when the emissions limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. *567 IAC 22.108(16)*

G15. Permit Deviation Reporting Requirements

A deviation is any failure to meet a term, condition or applicable requirement in the permit. Reporting requirements for deviations that result in a hazardous release or excess emissions have been indicated above (see G13 and G14). Unless more frequent deviation reporting is specified in the permit, any other deviation shall be documented in the semi-annual monitoring report and the annual compliance certification (see G4 and G5). *567 IAC 22.108(5)"b"*

G16. Notification Requirements for Sources That Become Subject to NSPS and NESHAP Regulations

During the term of this permit, the permittee must notify the department of any source that becomes subject to a standard or other requirement under 567-subrule 23.1(2) (standards of performance of new stationary sources) or section 111 of the Act; or 567-subrule 23.1(3) (emissions standards for hazardous air pollutants), 567-subrule 23.1(4) (emission standards for hazardous air pollutants for source categories) or section 112 of the Act. This notification shall be submitted in writing to the department pursuant to the notification requirements in 40 CFR Section 60.7, 40 CFR Section 61.07, and/or 40 CFR Section 63.9. *567 IAC 23.1(2), 567 IAC 23.1(3), 567 IAC 23.1(4)*

G17. Requirements for Making Changes to Emission Sources That Do Not Require Title V Permit Modification

1. Off Permit Changes to a Source. Pursuant to section 502(b)(10) of the CAAA, the permittee may make changes to this installation/facility without revising this permit if:

- a. The changes are not major modifications under any provision of any program required by section 110 of the Act, modifications under section 111 of the act, modifications under section 112 of the act, or major modifications as defined in 567 IAC Chapter 22.
- b. The changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions);
- c. The changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or as total emissions);
- d. The changes are not subject to any requirement under Title IV of the Act.
- e. The changes comply with all applicable requirements.
- f. For such a change, the permitted source provides to the department and the administrator by certified mail, at least 30 days in advance of the proposed change, a written notification, including the following, which must be attached to the permit by the source, the department and the administrator:
 - i. A brief description of the change within the permitted facility,
 - ii. The date on which the change will occur,

- iii. Any change in emission as a result of that change,
 - iv. The pollutants emitted subject to the emissions trade
 - v. If the emissions trading provisions of the state implementation plan are invoked, then Title V permit requirements with which the source shall comply; a description of how the emissions increases and decreases will comply with the terms and conditions of the Title V permit.
 - vi. A description of the trading of emissions increases and decreases for the purpose of complying with a federally enforceable emissions cap as specified in and in compliance with the Title V permit; and
 - vii. Any permit term or condition no longer applicable as a result of the change.
- 567 IAC 22.110(1)*

2. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), record keeping, reporting, or compliance certification requirements. *567 IAC 22.110(2)*
3. Notwithstanding any other part of this rule, the director may, upon review of a notice, require a stationary source to apply for a Title V permit if the change does not meet the requirements of subrule 22.110(1). *567 IAC 22.110(3)*
4. The permit shield provided in subrule 22.108(18) shall not apply to any change made pursuant to this rule. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the state implementation plan authorizing the emissions trade. *567 IAC 22.110(4)*
5. Aggregate Insignificant Emissions. The permittee shall not construct, establish or operate any new insignificant activities or modify any existing insignificant activities in such a way that the emissions from these activities no longer meet the criteria of aggregate insignificant emissions. If the aggregate insignificant emissions are expected to be exceeded, the permittee shall submit the appropriate permit modification and receive approval prior to making any change. *567 IAC 22.103(2)*
6. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes, for changes that are provided for in this permit. *567 IAC 22.108(11)*

G18. Duty to Modify a Title V Permit

1. Administrative Amendment.

- a. An administrative permit amendment is a permit revision that is required to do any of the following:
 - i. Correct typographical errors
 - ii. Identify a change in the name, address, or telephone number of any person identified in the permit, or provides a similar minor administrative change at the source;
 - iii. Require more frequent monitoring or reporting by the permittee; or
 - iv. Allow for a change in ownership or operational control of a source where the director determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new permittee has been submitted to the director.
- b. The permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. The request shall be submitted to the director.

c. Administrative amendments to portions of permits containing provisions pursuant to Title IV of the Act shall be governed by regulations promulgated by the administrator under Title IV of the Act.

2. Minor Permit Modification.

- a. Minor permit modification procedures may be used only for those permit modifications that do any of the following:
 - i. Do not violate any applicable requirements
 - ii. Do not involve significant changes to existing monitoring, reporting or recordkeeping requirements in the Title V permit.
 - iii. Do not require or change a case by case determination of an emission limitation or other standard, or increment analysis.
 - iv. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed in order to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include any federally enforceable emissions caps which the source would assume to avoid classification as a modification under any provision under Title I of the Act; and an alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Act.;
 - v. Are not modifications under any provision of Title I of the Act; and
 - vi. Are not required to be processed as significant modification.
- b. An application for minor permit revision shall be on the minor Title V modification application form and shall include at least the following:
 - i. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs.
 - ii. The permittee's suggested draft permit
 - iii. Certification by a responsible official, pursuant to 567 IAC 22.107(4), that the proposed modification meets the criteria for use of a minor permit modification procedures and a request that such procedures be used; and
 - iv. Completed forms to enable the department to notify the administrator and the affected states as required by 567 IAC 22.107(7).
- c. The permittee may make the change proposed in its minor permit modification application immediately after it files the application. After the permittee makes this change and until the director takes any of the actions specified in 567 IAC 22.112(4) "a" to "c", the permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time, the permittee need not comply with the existing permit terms and conditions it seeks to modify. However, if the permittee fails to comply with its proposed permit terms and conditions during this time period, existing permit term terms and conditions it seeks to modify may subject the facility to enforcement action.

3. Significant Permit Modification. Significant Title V modification procedures shall be used for applications requesting Title V permit modifications that do not qualify as minor Title V modifications or as administrative amendments. These include but are not limited to all significant changes in monitoring permit terms, every relaxation of reporting or recordkeeping permit terms, and any change in the method of measuring compliance with existing requirements. Significant Title V modifications shall meet all requirements of 567 IAC Chapter 22, including those for applications, public participation, review by affected states, and review by the administrator, and those requirements that apply to Title V issuance and renewal. 567 IAC 22.111-567 IAC 22.113 The permittee shall submit an

application for a significant permit modification not later than three months after commencing operation of the changed source unless the existing Title V permit would prohibit such construction or change in operation, in which event the operation of the changed source may not commence until the department revises the permit. 567 IAC 22.105(1)"a"(4)

G19. Duty to Obtain Construction Permits

Unless exempted under 567 IAC 22.1(2), the permittee must not construct, install, reconstruct, or alter any equipment, control equipment or anaerobic lagoon without first obtaining a construction permit, conditional permit, or permit pursuant to 567 IAC 22.8, or permits required pursuant to 567 IAC 22.4 and 567 IAC 22.5. Such permits shall be obtained prior to the initiation of construction, installation or alteration of any portion of the stationary source. 567 IAC 22.1(1)

G20. Asbestos

The permittee shall comply with 567 IAC 23.1(3)"a", and 567 IAC 23.2(3)"g" when conducting any renovation or demolition activities at the facility. 567 IAC 23.1(3)"a", and 567 IAC 23.2

G21. Open Burning

The permittee is prohibited from conducting open burning, except as may be allowed by 567 IAC 23.2. 567 IAC 23.2 except 23.2(3)"h"; 567 IAC 23.2(3)"h" - State Only

G22. Acid Rain (Title IV) Emissions Allowances

The permittee shall not exceed any allowances that it holds under Title IV of the Act or the regulations promulgated there under. Annual emissions of sulfur dioxide in excess of the number of allowances to emit sulfur dioxide held by the owners and operators of the unit or the designated representative of the owners and operators is prohibited. Exceedences of applicable emission rates are prohibited. "Held" in this context refers to both those allowances assigned to the owners and operators by USEPA, and those allowances supplementally acquired by the owners and operators. The use of any allowance prior to the year for which it was allocated is prohibited. Contravention of any other provision of the permit is prohibited. 567 IAC 22.108(7)

G23. Stratospheric Ozone and Climate Protection (Title VI) Requirements

1. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:

- a. All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to § 82.106.
- b. The placement of the required warning statement must comply with the requirements pursuant to § 82.108.
- c. The form of the label bearing the required warning statement must comply with the requirements pursuant to § 82.110.
- d. No person may modify, remove, or interfere with the required warning statement except as described in § 82.112.

2. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.

- d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with reporting and recordkeeping requirements pursuant to § 82.166. ("MVAC-like appliance" as defined at § 82.152)
 - e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156.
 - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.
3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
4. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant,
5. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *40 CFR part 82*

G24. Permit Reopenings

1. This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. *567 IAC 22.108(9)"c"*
2. Additional applicable requirements under the Act become applicable to a major part 70 source with a remaining permit term of 3 or more years. Revisions shall be made as expeditiously as practicable, but not later than 18 months after the promulgation of such standards and regulations.
- a. Reopening and revision on this ground is not required if the permit has a remaining term of less than three years;

b. Reopening and revision on this ground is not required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to 40 CFR 70.4(b)(10)(i) or (ii) as amended to June 25, 1993.

c. Reopening and revision on this ground is not required if the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. *567 IAC 22.108(17)"a", 567 IAC 22.108(17)"b"*

3. A permit shall be reopened and revised under any of the following circumstances:

a. The department receives notice that the administrator has granted a petition for disapproval of a permit pursuant to 40 CFR 70.8(d) as amended to June 25, 1993, provided that the reopening may be stayed pending judicial review of that determination;

b. The department or the administrator determines that the Title V permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Title V permit;

c. Additional applicable requirements under the Act become applicable to a Title V source, provided that the reopening on this ground is not required if the permit has a remaining term of less than three years, the effective date of the requirement is later than the date on which the permit is due to expire, or the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. Such a reopening shall be complete not later than 18 months after promulgation of the applicable requirement.

d. Additional requirements, including excess emissions requirements, become applicable to a Title IV affected source under the acid rain program. Upon approval by the administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

e. The department or the administrator determines that the permit must be revised or revoked to ensure compliance by the source with the applicable requirements. *567 IAC 22.114(1)*

4. Proceedings to reopen and reissue a Title V permit shall follow the procedures applicable to initial permit issuance and shall effect only those parts of the permit for which cause to reopen exists. *567 IAC 22.114(2)*

G25. Permit Shield

Compliance with the conditions of this permit shall be deemed compliance with the applicable requirements included in this permit as of the date of permit issuance.

This permit shield shall not alter or affect the following:

1. The provisions of section 303 of the Act (emergency orders), including the authority of the administrator under that section;

2. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

3. The applicable requirements of the acid rain program, consistent with section 408(a) of the Act;

4. The ability of the department or the administrator to obtain information from the facility pursuant to section 114 of the Act. *567 IAC 22.108 (18)*

G26. Severability

The provisions of this permit are severable and if any provision or application of any provision is found to be invalid by this department or a court of law, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected by such finding. 567 IAC 22.108 (8)

G27. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege. 567 IAC 22.108 (9)"d"

G28. Transferability

This permit is not transferable from one source to another. If title to the facility or any part of it is transferred, an administrative amendment to the permit must be sought to determine transferability of the permit. 567 IAC 22.111 (1)"d"

G29. Disclaimer

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. 567 IAC 22.3(3)"c"

G30. Notification and Reporting Requirements for Stack Tests or Monitor Certification

The permittee shall notify the department's stack test contact in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor is performed to determine compliance with an applicable requirement. For the department to consider test results a valid demonstration of compliance with applicable rules or a permit condition, such notice shall be given. Such notice shall include the time, the place, the name of the person who will conduct the test and other information as required by the department. Unless specifically waived by the department's stack test contact, a pretest meeting shall be held not later than 15 days prior to conducting the compliance demonstration. The department may accept a testing protocol in lieu of a pretest meeting. A representative of the department shall be permitted to witness the tests. Results of the tests shall be submitted in writing to the department's stack test contact in the form of a comprehensive report within six weeks of the completion of the testing. Compliance tests conducted pursuant to this permit shall be conducted with the source operating in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which the source shall be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the equipment manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the department that the source has been physically altered so that capacity cannot be exceeded, or the department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the department to determine whether such source is in compliance.

Stack test notifications, reports and correspondence shall be sent to:

Stack Test Review Coordinator
Iowa DNR, Air Quality Bureau
7900 Hickman Road, Suite #1
Urbandale, IA 50322
(515) 242-6001

Within Polk and Linn Counties, stack test notifications, reports and correspondence shall also be directed to the supervisor of the respective county air pollution program.

567 IAC 25.1(7)"a", 567 IAC 25.1(9)

G31. Prevention of Air Pollution Emergency Episodes

The permittee shall comply with the provisions of 567 IAC Chapter 26 in the prevention of excessive build-up of air contaminants during air pollution episodes, thereby preventing the occurrence of an emergency due to the effects of these contaminants on the health of persons. *567 IAC 26.1(1)*

G32. Contacts List

The current address and phone number for reports and notifications to the EPA administrator is:

Chief of Air Permits
EPA Region 7
Air Permits and Compliance Branch
901 N. 5th Street
Kansas City, KS 66101
(913) 551-7020

The current address and phone number for reports and notifications to the department or the Director is:

Chief, Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite #1
Urbandale, IA 50322
(515) 242-5100

Reports or notifications to the DNR Field Offices or local programs shall be directed to the supervisor at the appropriate field office or local program. Current addresses and phone numbers are:

Field Office 1

909 West Main – Suite 4
Manchester, IA 52057
(563) 927-2640

Field Office 2

P.O. Box 1443
2300-15th St., SW
Mason City, IA 50401
(641) 424-4073

Field Office 3

1900 N. Grand Ave.
Spencer, IA 51301
(712) 262-4177

Field Office 4

1401 Sunnyside Lane
Atlantic, IA 50022
(712) 243-1934

Field Office 5

401 SW 7th Street, Suite I
Des Moines, IA 50309
(515) 725-0268

Field Office 6

1023 W. Madison
Washington, IA 52353-1623
(319) 653-2135

Polk County Public Health Dept.

Air Quality Division
5885 NE 14th St.
Des Moines, IA 50313
(515) 286-3351

Linn County Public Health Dept.

Air Pollution Control Division
501 13th St., NW
Cedar Rapids, IA 52405
(319) 892-6000

Appendix: Iowa DNR Air Quality Policy 3-b-08

1998 NOV 13 4

IOWA DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

POLICY/PROCEDURE STATEMENT

TOPIC: <u>Opacity Limits</u>

Policy Procedure Number: 3-b-08

Replaces Number: None

Date:

Effective Date: November 12, 1998

Preparer: David Phelps

Reviewer:

Approval: **Bureau Chief:** Peter Hamlin

Date: 11/12/98

Division Administrator: Allan Stokes

Date: 11/12/98

Applicable Code of Iowa or Iowa Administrative Code Rule: 23.3(2)d

“No person shall allow, cause or permit the emission of visible air contaminants into the atmosphere from any equipment, internal combustion engine, premise fire, open fire or stack, equal to or in excess of 40 percent opacity or that level specified in a construction permit, except as provided below and in 567-Chapter 24.”

REASON OR BACKGROUND

The default opacity limit allowed by regulation is 40%. This limit was established with the original regulations in 1970. It is generally accepted that opacity greater than 40% was evidence of a mass emission standard exceedence. More recently, there have been requests from facilities for limits much lower than that allowed by the regulations, in some cases less than 0.01 gr/scf to which a 40% opacity limit does not correspond. Since opacity is used as an indicator of the particulate emission rate, listing an indicated potential problem opacity that is more in line with the mass emission rate is useful. In order to have the authority to set limits lower than 40%, subrule 23.3(2)d was changed. This change allows the department the ability to set opacity limits at a level that more closely corresponds to what would be observed by the source when operating in compliance with its mass emission rate.

Except in the case where a specific opacity limit is established by rule, it has been the general policy of the Department not to take action on opacity limits directly. Rather, if it is felt that a violation of the mass emission rate exists that is not attributable to some abnormal event, a stack test would be required to verify compliance. However, the Department reserves the right to use the results of formal opacity readings as evidence of an exceedence.

DETAILS

It shall be the policy of the Department to list the default opacity as a permit condition and in addition an indicator opacity may be listed.

For ease of proving continual compliance a source may request a 'no visible emissions' opacity limit which allows proof of compliance without having a certified opacity reading taken. In this case any visible emissions would be an exceedence.

The IDNR permit writer may list an opacity that will be a indicator of possible mass emission rate exceedence. If the permittee wishes, the recommended indicator opacity may be changed by demonstrating compliance with the mass emission rate during a stack test while emitting the new desired indicator opacity. If the tested mass emission rate is less than the permitted emission rate, then the desired indicator opacity may be set at a proportionally higher level than observed during the stack test.

If an opacity measurement, taken in accordance with an approved reference method for opacity, (generally USEPA Method 9 or 22) exceeds the indicator opacity then the facility will promptly investigate the source and make corrections. However, if after corrections are made the opacity continues to exceed the indicator opacity the Department may require additional proof to demonstrate compliance with the mass emissions limits.

Recommended indicator opacities shall be:

Grain Loading gr./scf	Recommended Indicator Opacity
<0.01 gr./scf	non specified in permit *
0.01 to 0.06 gr./scf	10% Opacity
0.061 to 0.08 gr./scf	20% Opacity
0.081 to 0.1 gr./scf	25% Opacity

* A line is added to the permit that states: "If visible emissions are observed other than start-up, shut-down, or malfunction, a stack test may be required to demonstrate compliance with the particulate standard."

If a source is a batch process the indicator opacity shall be based on the table above, but the opacity averaging period, for comparison to the indicator opacity, shall be the entire batch cycle. For purposes of comparison the indicator opacity readings shall be taken during the entire cycle and averaged.

Sources are also given the opportunity to set source specific limits to be coordinated with the initial compliance test. These may then be incorporated into the permit.

In all cases an exceedence of the indicator opacity will require the permittee to file an "indicator opacity exceedence report" to the IDNR regional office. The reporting requirements shall be:

Oral report of excess indicator opacity. An incident of excess indicator opacity (other than an incident of excess indicator opacity during a period of startup, shutdown, or cleaning) shall be reported to the appropriate regional office of the department within eight hours of, or at the start of the first working day following the onset of the of the incident. The reporting exemption for an incident of excess indicator opacity during startup and shutdown or cleaning does not relieve the owner or operator of a source with continuous monitoring equipment of the obligation of submitting reports required in subrule 25.1(6).

An oral report of excess indicator opacity is not required for a source with operational continuous monitoring equipment (as specified in subrule 25.1(1) if the incident of excess indicator opacity continues for less than 30 minutes and does not exceed the applicable visible emission standard by more than 10 percent opacity.

The oral report may be made in person or by telephone and shall include as a minimum the following:

- a) The identity of the equipment or source operation from which the excess indicator opacity originated and the associated stack or emission point.
- b) The estimated quantity of the excess indicator opacity.
- c) The time and expected duration of the excess indicator opacity.
- d) The cause of the excess indicator opacity.
- e) The steps being taken to remedy the excess indicator opacity.
- f) The steps being taken to limit the excess indicator opacity in the interim period.

Written report of excess indicator opacity. A written report of an incident of excess indicator opacity shall be submitted as a follow-up to all required oral reports to the department within seven (7) days of the onset of the upset condition, and shall include as a minimum the following:

- a) The identity of the equipment or source operation point from which the excess emission originate and the associated stack or emission point.
- b) The estimated quantity of the excess indicator opacity.
- c) The time and duration of the excess indicator opacity.
- d) The cause of the excess indicator opacity.
- e) The steps that were taken to remedy and to prevent the recurrence of the incident of excess indicator opacity.
- f) The steps that were taken to limit the excess indicator opacity.
- g) If the owner claims that the excess indicator opacity was due to malfunction, documentation to support this claim.

Exceptions to this policy:

- 1) In the case where a facility has an opacity limit established in an existing permit, no change will be made to that permit limit unless the permit is being modified for other purposes.
- 2) If the facility has a continuous opacity monitor, this policy shall not apply.
- 3) This policy shall not apply to opacity limits established in Prevention of Significant Deterioration (PSD) permits or permits that were established for maintenance plans for nonattainment areas.
- 4) This policy shall not apply where an opacity limit is established as an indication of hazardous air pollutants.

- 5) This policy shall not apply where an opacity limit is established by a rule, New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAPS), etc.